

## **Deposition of Adam Ralph Braatz**

**Oregon Firearms Federation, Inc., et al. v. Brown, et al.**

**January 17, 2023**



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IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

PORLTAND DIVISION

|                             |   |                       |
|-----------------------------|---|-----------------------|
| OREGON FIREARMS FEDERATION, | ) |                       |
| INC., et al.,               | ) |                       |
| Plaintiffs,                 | ) |                       |
|                             | ) |                       |
| v.                          | ) | Nos. 2:22-cv-01815-IM |
|                             | ) | 3:22-cv-01859-IM      |
| KATE BROWN, et al.,         | ) | 3:22-cv-01862-IM      |
| Defendants.                 | ) | 3:22-cv-01869-IM      |
| -----                       | ) |                       |
| MARK FITZ, et al.,          | ) |                       |
| Plaintiffs,                 | ) |                       |
|                             | ) |                       |
| v.                          | ) |                       |
|                             | ) |                       |
| ELLEN F. ROSENBLUM, et al., | ) |                       |
| Defendants.                 | ) |                       |
| -----                       | ) |                       |
| KATERINA B. EYRE, et al.,   | ) |                       |
| Plaintiffs,                 | ) |                       |
|                             | ) |                       |
| v.                          | ) |                       |
|                             | ) |                       |
| ELLEN F. ROSENBLUM, et al., | ) |                       |
| Defendants.                 | ) |                       |
| -----                       | ) |                       |
| DANIEL AZZOPARDI, et al.,   | ) |                       |
| Plaintiffs,                 | ) |                       |
|                             | ) |                       |
| v.                          | ) |                       |
|                             | ) |                       |
| ELLEN F. ROSENBLUM, et al., | ) |                       |
| Defendants.                 | ) |                       |

VIDEOTAPED DEPOSITION OF ADAM RALPH BRAATZ

Taken on behalf of Defendants

January 17, 2023

REPORTED BY: Robin L. Nodland, Oregon CSR No. 90-0056

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Ex. 2 - Wilson Decl.

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1 VIDEO DEPOSITION OF ADAM RALPH BRAATZ

2 Taken on behalf of Defendants

3 \* \* \*

4 BE IT REMEMBERED THAT, pursuant to the Federal  
5 Rules of Civil Procedure, the video-recorded deposition  
6 of ADAM RALPH BRAATZ was taken before Robin L. Nodland,  
7 an Oregon Certified Shorthand Reporter, a Registered  
8 Diplomate Reporter, and a Certified Realtime Reporter,  
9 on Tuesday, January 17, 2023, commencing at the hour of  
10 2:05 p.m., in the law offices of JURISLAW LLP, Three  
11 Centerpointe Drive, Suite 160, Lake Oswego, Oregon.

12 \* \* \*

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1 APPEARANCES:

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17 Attorney for Defendants

18 Mr. Rick Majewski, Videographer

19 \* \* \*

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| 1 | EXAMINATION INDEX                  |      |
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| 3 | Examination by Ms. Hoffman         | 6    |
| 4 | Examination by Mr. Lindsay         | 62   |
| 5 | Further Examination by Ms. Hoffman | 73   |

\* \* \*

|    |                    |                            |      |
|----|--------------------|----------------------------|------|
| 10 | EXHIBIT INDEX      |                            |      |
| 11 | No.                | Item                       | Page |
| 12 | Exhibit 10         | Declaration of Adam Braatz | 10   |
| 13 |                    |                            |      |
| 14 | (Attached hereto.) |                            |      |

\* \* \*

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1 02:58:44 toaster ovens and clothes and stuff like that.

2 Q How much revenue do you typically bring in on a --  
3 just a normal Black Friday weekend?

4 A A normal Black Friday weekend, I believe 65,000 was  
5 02:59:04 one of our better years.

6 Q How much revenue did you bring in this past 2022  
7 Black Friday weekend?

8 A I believe we beat that by several thousand dollars,  
9 just because of the timing.

10 02:59:22 Q What do you mean by "the timing"?

11 A With the -- the Measure 114 going into effect,  
12 people were trying to get the stuff that they wanted to  
13 buy before the measure took effect on December 8th.

14 Q So demand increased?

15 02:59:37 A Demand increased because of Measure 114.

16 Q Going back to some of the comments you heard about  
17 the permit-to-purchase program, many of your customers  
18 have a concealed carry permit; right?

19 A Right.

20 02:59:52 Q Do you ever hear similar comments about concealed  
21 carry permits?

22 A Like what?

23 Q Do you ever hear a customer say that they don't  
24 think they should be required to have a concealed carry  
25 03:00:06 permit?

## 1 CERTIFICATE

2 I, Robin L. Nodland, an Oregon Certified  
3 Shorthand Reporter, a Washington Certified Court  
4 Reporter, a Registered Diplomate Reporter, and a  
5 Certified Realtime Reporter, hereby certify that said  
6 witness personally appeared before me at the time and  
7 place set forth in the caption hereof; that at said time  
8 and place I reported in stenotype all testimony adduced  
9 and other oral proceedings had in the foregoing matter;  
10 that thereafter my notes were transcribed through  
11 computer-aided transcription, under my direction; and  
12 that the foregoing pages constitute a full, true and  
13 accurate record of all such testimony adduced and oral  
14 proceedings had, and of the whole thereof.

15 I further certify that review of the  
16 transcript was requested.

17 Witness my hand at Portland, Oregon, this 23rd  
18 day of January, 2023.

19  
20  
21 

22 Robin L. Nodland  
23 Oregon CSR No. 90-0056  
24 Expires 3/31/23  
25 Washington CCR No. 2530  
Expires 11/11/23